

EPA Region 10 Superfund  
**RELEASABLE**  
Date 10/5/05  
Initial CSFR

~~CONFIDENTIAL~~

8.1

11/13/2003

The attached document was provided by Teck Cominco American Incorporated to EPA Region 10 on November 13, 2003.

~~The attached document has been determined by EPA to be FOIA Exempt under exemption 7(A).~~

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## **Teck Cominco American Commitments and the EPA SOW**

Comments provided by EPA in correspondence of November 7, 2003, indicate that the agency does not fully understand the dimensions and scope of the TCAI proposal. This situation has developed because the proposed agreement and schedules submitted on October 22, 2003 did not fully detail the activities contemplated in the human health and ecological risk assessments and the measures that would be taken to address CERCLA regulatory guidance. It was assumed, at the time, that the technical and regulatory guidance scope of the proposal would be the subject of ensuing discussions between the TCAI and EPA technical teams.

The purpose of this statement is to provide clarification on these issues and to document how the TCAI proposal substantively meets the SOW requirements for remedial investigations. Moreover, it outlines the actions that TCAI is prepared to carry out to address the feasibility study requirements of the SOW. Therefore, it represents an expansion of the earlier proposal to accommodate all important components of an RI/FS as outlined in the SOW.

Attached to this statement are preliminary schedules of the major work components of the risk assessments contemplated in the original proposal as well as the new commitment to complete an analysis of remedial options. With the exception of the latter, the elements conform to the key target dates contained in the proposed agreement and, in themselves, more fully explain the dimensions of the proposal.

TCAI's commitments with respect to the major elements of the RI/FS SOW are briefly outlined as follows:

### **Scoping**

TCAI believes that its expanded proposal fully satisfies all requirements of this task as described in the SOW. The scope brief scope descriptions in the attached schedules indicate that the activities contemplated in this phase of the human health and ecological risk assessments included:

- Existing data compilation and data quality reviews with EPA approval (Note: TCAI has already commenced data compilation)
- Site visit by a large team of TCAI, consultants, EPA and key stakeholder personnel
- Problem formulation based on further development of conceptual site models prepared with EPA technical staff input
- Data needs assessment

Bearing in mind the guidance of EPA technical staff at the September 15/16 meetings, the need for the development of preliminary remediation goals related to metals contaminants is recognized and will be included. At the same time, however, TCAI is committed to facilitate or lead a whole lake limiting factors assessment in which broader lake management goals will be considered.

The project planning component in this phase of the task will be expanded to include the process of defining and assessing remedial options. Given the nature of metals contamination at the site and the fact that continuing releases are not a significant concern, it is unlikely that treatability studies will be required but these are not completely discounted at this time. As for the ARAR identification, it is the belief of TCAI that a risk-based assessment of cleanup standards be employed to better reflect the nature of the slag-based metals contamination and the lack of currently promulgated fresh-water sediment standards which would apply for the majority of the site. ARAR identification for other media will be provided for.

Complete RI/FS work plans and sampling and analysis plans for human health and ecological risk site characterization will be produced and reviewed with agencies and key interest groups in accordance with requirements set out in the SOW.

### **Community Relations**

While EPA views this task as being within its scope of primary responsibility, TCAI envisions that it will take the lead but with EPA oversight. A plan will be developed early in the Scoping phase and carried out as a part of the review process involving the Eastern Washington Council of Governments, Tribes and federal and state agencies.

### **Site Characterization**

In its comments on the original TCAI proposal, EPA referred to the plan as entailing only a "limited site characterization" but this is certainly not the case. Had there been an earlier opportunity for additional meetings of the technical teams, this view would have been corrected. In fact, TCAI has contemplated that substantive site characterization programs would be required and the attached schedules assume that a second major field program during low reservoir levels to satisfy data collection needs for both the health and ecological assessments may be needed. Provisions will be made in the scope of site characterization studies to obtain engineering and other data to support the further analysis of remedial options. All work would be done in accordance with EPA protocols concerning data collection quality and management.

As the ecological assessment schedule indicates, a very large component of work on sediment and associated metals transport and fate was implicit in the original proposal. At this time, the extent of modeling work needed to accompany this part of the study plan can not be determined but if a large effort is required, it would have a substantive impact on the cost dimensions of the site characterization task. TCAI is prepared to address this eventuality.

Reporting will be carried out in accordance with the requirements of the SOW. At this time, TCAI anticipates that it will be largely responsible for completing the human health and ecological risk assessments in the Remedial Investigations report but realizes that the decision for such an assignment will be made by EPA in accordance with criteria set out in guidance.

### **Treatability Studies**

At this time, TCAI does not envision that this task will be required in the overall RI/FS work plan but it could be added based on initial data reviews or the first phase of site characterization work.

### **Detailed Analysis of Remedial Alternatives**

Action on this task, if necessary will commence once the Remedial Investigations report is finalized and accepted by EPA. The analysis will be carried out in accordance with the criteria set out in guidance and the deliverable will be a Feasibility Study report.

LR Proposed Work Schedule.xls

Activity	Estimated Cost		2003				2004				2005				2006				2007																																			
	Minimum	Maximum	S	O	N	D	J	F	M	A	M	J	J	I	A	S	O	N	D	J	F	M	A	M	J	J	I	A	S	O	N	D	J	F	M	A	M	J	J	I	A	S	O	N	D									
Months Since Start of Work			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52
Human Health Preliminary Data Assessment (Phase 1)			Complete existing data, data quality review, EPA review/approval, site visit, problem formulation preliminary data assessment, ID of potential remedial alts.																																																			
Eco Preliminary Data Assessment (Phase 1)	\$220,000	\$270,000																																																				
Site Characterization Work Plan	\$50,000	\$75,000																																																				
HHRA Work Plan	\$170,000	\$190,000																																																				
Eco Workplan	\$115,000	\$140,000																																																				
Write HH and Eco SAP(s) and Conduct Phase 2 HH Data Collection	\$150,000	\$225,000																																																				
Conduct Eco Phase 2 Studies and submit reports to EPA. Includes metal speciation	\$675,000	\$975,000																																																				
Site Characterization report and HH Data Assessment (Phase 2 Data)	\$500,000	\$750,000																																																				
Eco Data Assessment (Phase 2 Data)	\$200,000	\$250,000																																																				
Write HH SAP if needed and Conduct Phase 3 Data Collection	\$75,000	\$125,000																																																				
Write Eco Phase 3 SAP if needed Baseline HH RA	\$150,000	\$300,000																																																				
	\$50,000	\$75,000																																																				
	\$125,000	\$175,000																																																				
Sediment Transport (No Modeling)	\$600,000	\$700,000																																																				
Sediment Transport Modeling	\$1,450,000	\$2,300,000																																																				
Metal Bioavailability Modeling	\$250,000	\$650,000																																																				
Conduct Phase 3 Studies and submit reports to EPA (if needed)	\$200,000	\$300,000																																																				
Eco Data Assessment (Phase 3 Data) (If Needed)	\$60,000	\$90,000																																																				
Baseline Eco RA (metal issues only). Assumes will have to report on sed transport modeling and bioavailability studies	\$200,000	\$300,000																																																				
Remediation Alternatives Assessment	\$500,000	\$750,000																																																				
Totals (no modeling or Phase 3)	\$3,780,000	\$5,300,000																																																				
Totals (modeling & Phase 3)	\$5,740,000	\$8,640,000																																																				